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CRYSTAL MAGIC, INC., JIMAC MARKETING, INC.
CERION GMBH, AND VITRO LASER GMBH

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LASER DESIGN INTERNATIONAL, LLC;
and NORWOOD OPERATING COMPANY,
Plaintiffs,

v.

CRYSTAL MAGIC, INC., a Florida
corporation, JIMAC MARKETING, INC., a
Canadian corporation, CERION GMBH, a
German limited liability company, and VITRO
LASER GMBH, a German limited liability
company,

Defendants.

AND RELATED COUNTERCLAIMS

Case No. C 03-01179 JSW
Consolidated with No. C 03-3905 JSW

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME TO
OBTAIN DISCOVERY FROM NON-
PARTY BAUBLYS CONTROL LASER
PURSUANT TO A SUBPOENA**

Plaintiffs Laser Design International, LLC and Norwood Operating Company
("Plaintiffs"), and defendants and counterclaimants Crystal Magic, Inc., Jimac Marketing, Inc.,

1 Cerion GmbH, and Vitro Laser GmbH (“Defendants,” and collectively, “the Parties”), by their
2 undersigned counsel, hereby submit the following stipulation:

3 1. This Court, in its May 16, 2006 order granting Defendants’ motion for leave to file
4 amended final invalidity contentions, extended the discovery deadline in this case until August 18,
5 2006 to allow the Parties to conduct discovery with respect to the ABBA and CAQE prior art.

6 2. Defendants served a subpoena *duces tecum* on non-party Baublys Control Laser
7 (“Baublys”) on July 28, 2006, requesting documents and testimony relating to, *inter alia*, the
8 ABBA prior art. The subpoena called for Baublys to produce requested documents on August 7,
9 2006, and to designate a witness to appear for deposition under Fed. R. Civ. P. 30(b)(6) on August
10 16, 2006.

11 3. While it has agreed to produce some documents, Baublys has stated that it will be
12 unable to comply with the noticed deposition date because its counsel will be unavailable until
13 August 21, 2006.

14 4. Counsel for Plaintiffs has stated that it is unavailable from August 21 through the
15 end of the month.

16 5. Moreover, Baublys has stated that it is unavailable from August 24 until mid-
17 September because it must prepare for and attend an important industry trade show.

18 6. Based on the foregoing, the Parties have agreed to extend the time for taking of
19 discovery relating to the ABBA prior art for the limited purposes of obtaining discovery from
20 Baublys.

21 7. Accordingly, the undersigned hereby stipulate that the discovery cutoff be extended
22 until October 8, 2006 for purposes of discovery relating to the subpoena that Defendants served on
23 Baublys.

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26 ////

1 DATED: August 14, 2006.

2 COOLEY GOODWARD LLP

3 By: /s/ Iain Cunningham

4 Iain Cunningham

5 Attorneys for Plaintiffs

6 Laser Design International, LLC

7 and Norwood Operating Company

8 DATED: August 14, 2006.

9 PERKINS COIE LLP

10 By: /s/ Scott D. Eads

11 Scott D. Eads

12 Attorneys for Defendants

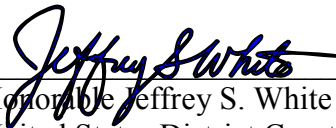
13 Crystal Magic, Inc., Jimac Marketing, Inc.,

14 Cerion GmbH, and Vitro Laser GmbH

15 Pursuant to stipulation, IT IS SO ORDERED.

16 DATED: August 15, 2006, 2006.

17 By

18 

19 Honorable Jeffrey S. White

20 United States District Court Judge